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8	Intorneys for Defendant Synthiony Bank		
9	UNITED STATES DISTRICT COURT		
10	DISTRICT OF NEVADA		
11	JESSEY PRESHER,	Case No. 2:23-cv-00146-JCM-NJK	
12	Plaintiff,		
13	V.		
14	EQUIFAX INFORMATION SERVICES, LLC;	JOINT UNOPPOSED MOTION TO	
15	CITI BANK NORTH AMERICA; BEST BUY CO, INC.; SYNCHRONY BANK/LOWES;	EXTEND DEADLINE FOR DEFENDANT SYNCHRONY BANK	
	CAPITAL ONE BANK (USA), N.A.; TO RESPOND TO COMPLAINT		
16	JPMORGAN CHASE BANK & CO.; and WELLS FARGO BANK, N.A., (FIRST REQUEST)		
17	Defendants.		
18			
19	Defendant Synchrony Bank/Lowes ("Synchrony") and Plaintiff Jessey Presher ("Plaintiff"),		
20	by counsel and pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule IA 6-1,		
21	respectfully request that this Court extend the deadline in which Synchrony has to answer or		
22	otherwise respond to Plaintiff's Complaint, through and until April 28, 2023. In support of this		
23	Motion, the parties stipulate as follows:		
24	1. This is the first stipulation for 6	extension of time for Synchrony to respond to	
25	Plaintiff's Complaint.		
26	2. On January 26, 2023, Plaintiff filed a Complaint with this Court [ECF No. 1].		
27	3. Synchrony's current deadline to re	espond to the Complaint is March 28, 2023.	
28	///		
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4.	4. In order to evaluate this matter and explore the possibility of early resolution with		
Plaintiff, counsel for Synchrony desires a thirty (30) day extension until April 28, 2023, to file a			
response to the	e Complaint.		
5.	5. Counsel for Synchrony conferred with Plaintiff's counsel regarding this requested		
extension, and	l Plaintiff's counsel has no obj	jection.	
6.	6. The foregoing Motion is filed in good faith and not for dilatory or other improper		
purpose.			
7.	Plaintiff would not suffer as	ny prejudice by the Court permitting Synchrony the	
requested exte	ension of time and has consent	ted to the requested extension.	
8.	8. Granting this Motion is in the interests of justice and is otherwise the right and		
proper thing to	o do.		
DATE	D this 28th day of March, 202	23.	
LEWIS ROC CHRISTIE	CA ROTHGERBER LLP	FREEDOM LAW FIRM, LLC	
/s/ Brittni Ta	nenbaum	/s/ Gerardo Avalos	
J Christopher Brittni A. Ta 3993 Howard Las Vegas, N	nenbaum I Hughes Parkway, Suite 600	Gerardo Avalos 8985 South Eastern Avenue, Suite 100 Las Vegas, NV 89123 Counsel for Plaintiff Jessey Presher	
Counsel for Defendant Synchrony Bank		Counsel for 1 lumily Jessey 1 resner	
	RTHER EXTENSIONS E GRANTED.	ORDER  IT IS SO ORDERED.  UNITED STATES MAGISTRATE JUDGE	

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DATED: March 28, 2023